

**REDACTED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
**FILED**

MAR 11 2021

CLERK, U.S. DISTRICT COURT  
By \_\_\_\_\_ Deputy \_\_\_\_\_

UNITED STATES OF AMERICA

v.

No. 4:21-mj-164

STEPHEN RUSSELL ADAMS (01)

**CRIMINAL COMPLAINT**

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

From between on or about August 1, 2019 and on or about October 26, 2020, in the Northern District of Texas and elsewhere, **Stephen Russell Adams**, the defendant, did use and attempt to use a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was actually transported or transmitted using any means or facility of interstate or foreign commerce. Specifically, Adams used and attempted to use Minor Victim One to create the visual depiction described below, and such visual depiction was transported and transmitted via the Internet.

File Name	File Description
Photo Oct 25, 17 25 39.jpg	This image depicts a nude pubescent minor female, between the age of 12 and 13 years, standing in a bathroom. The female's face is blacked out and her arms are raised above her head. The focus of the image is on the nude minor female.

In violation of 18 U.S.C. § 2251(a) and (e).

I further state I am a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations (HSI), and this complaint is based on the following facts gathered through an investigation I have conducted, my training and experience, and information provided to me by other law enforcement officers.

**INTRODUCTION**

1. I have been employed as a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations (HSI), since December 2003. I am a graduate of the Criminal Investigator Training Program and the U.S. Immigration and Customs Enforcement Special Agent Training Academy. As a result of my employment with HSI, my duties include, but are not limited to, the investigation and enforcement of Titles 8, 18, 19, 21 and 31 of the United States Code. I am an “investigative or law enforcement officer of the United States” within the meaning defined in 18 U.S.C. § 2510(7), in that I am an agent of the United States authorized by law to conduct investigations of, and make arrests for, federal offenses.

2. I am currently assigned to the HSI Dallas Field Office, Child Exploitation Group, where I investigate criminal violations relating to the sexual exploitation of children, including the illegal production, distribution, receipt and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252 and 2252A. Based on my training and experience, I am aware that it is a violation of 18 U.S.C. § 2252(a)(1) for an individual to possess any visual depiction using any means or facility of interstate commerce, knowing the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

## OVERVIEW OF INVESTIGATION

3. On October 29, 2020, HSI Detroit Special Agent (SA) David Alley contacted HSI Dallas regarding a user on the mobile application Kik who was sending child exploitative images and claiming to be sexually abusing [REDACTED]. Specifically, SA Alley stated that on October 26, 2020 and October 27, 2020 he was acting in an undercover capacity in a Kik chat group devoted to the topic of incest. While in the chat group, SA Alley noticed Kik user “knowuser321123” posted the message “anyone want to cumtribute [REDACTED] [REDACTED]” and stated that she was 13 years old.<sup>1</sup> KIK user knowuser321123 then posted a clothed image of what appeared to be a teenage, minor female as well as a nude image of what appeared to be the same female stepping into a bathtub, with her back to the camera. Based on the angle of the camera as well as some of the lighting and shadows in the image, the minor does not appear to be aware that her image was being captured.

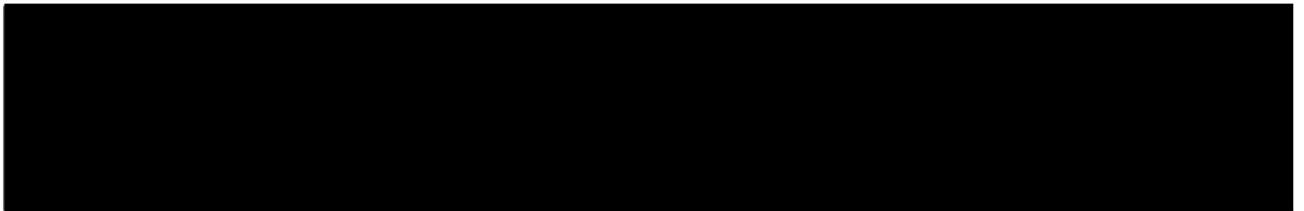
4. SA Alley sent Kik user knowuser321123 a private message and asked if he was “active” with [REDACTED]. Knowuser321123 stated he was, [REDACTED] [REDACTED] SA Alley asked what he did with the minor; and knowuser321123 stated, “almost everything except fuck her.” SA Alley asked knowuser321123 if he took any additional photographs, and knowuser321123 then sent SA Alley an image of a female’s bare bottom and a female’s exposed breasts. SA Alley also asked if knowuser321123 ever got “full nudes,” to which knowuser321123 responded by sending an image of a nude pubescent minor female with her face blacked out.

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<sup>1</sup> Messages are quoted verbatim, including typographical errors.  
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This image depicts a nude pubescent minor female, between the age of 12 and 13 years, standing in a bathroom. The female's arms are raised above her head. The focus of the image is on the nude minor female. The image depicts the minor female in what appears to be the same bathroom as the earlier photo that knowuser321123 had shared with the Kik group.

5. Because the image appeared to have been taken surreptitiously and without the knowledge of the minor, SA Alley asked if knowuser321123 had hidden cameras.



6. On October 27, 2020, SA Alley sent an emergency disclosure request to KIK for subscriber information for the account associated with knowuser321123. On October 29, 2020, KIK provided IP addresses for the account. SA Alley determined one of the IP addresses resolved to Jacksboro, Texas and Nextlink Broadband. SA Alley sent Nextlink Broadband a request for subscriber information for the account user of the Jacksboro IP address associated with knowuser321123 on October 27, 2020. Nextlink Broadband stated the account holder was Jacksboro Nursing Operations, LLC, Suzi Parker, 306 West 7 Street, Suite 430, Fort Worth, Texas 76458.

7. [REDACTED] the female in the images sent by knowuser321123 was identified as [REDACTED]  
[REDACTED]  
[REDACTED]

Texas Workforce Commission records indicated ADAMS received wages in the third quarter of 2020 from Jacksboro Nursing Operations LLC. ADAMS's residence and his place of employment are located in Jack County Texas, which are within the Northern District of Texas.

8. On October 29, 2020, Wise County District Attorney's Office Investigator Robert Pawley obtained a state search warrant for ADAM's residence in Jacksboro, Texas. Investigator Pawley, along with the Jack County Sheriff's Office and HSI Dallas Special Agents, served the search warrant on the home.

9. [REDACTED]



[REDACTED] hereafter referred to as MV1 (Minor Victim One).

10. Pursuant to the search warrant, an Apple iPhone 11Pro was located and seized. A forensic examination of the Apple iPhone was conducted by an HSI Computer Forensic Agent.

The forensic examination revealed a reference to a Dropbox cloud storage account associated with the email address “happydaddy321133@gmail.com.”

11. On February 2, 2021, Investigator Pawley submitted a state search warrant to Dropbox for the contents of the account related to happydaddy321133@gmail.com. On February 4, 2021, Dropbox complied with the search warrant and provided Investigator Pawley with the information. The Dropbox account related to happydaddy321133@gmail.com contained multiple images and videos of MV1.<sup>2</sup> In particular, the Dropbox account has what appears to be a surreptitious video recording of MV1 in the a bathroom, getting undressed and stepping into a bathtub to take a shower.

12. In addition to the video file, there are several still images that appear to be created from the video file, to include a nude image of MV1 with her face visible and the same nude image of MV1 with her face blacked out, which is further described below. The image of MV1 with her face blacked out matches the image sent by knowuser321123 to SA Alley on or about October 26, 2020. Dropbox records show this image was uploaded to the Dropbox account connected to the happydaddy321133@gmail account on or about October 25, 2020.

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<sup>2</sup> [REDACTED]

13. By creating still images from the surreptitious recording that focus on the nude body of MV1, ADAMS used and attempted to use MV1 to create a visual depiction of the minor engaging in sexually explicit conduct, that is, the lewd and lascivious exhibition of MV1's genitals. Below is a description of the image found in the Dropbox account of MV1 with the face blacked out:

File Name	File Description
Photo Oct 25, 17 25 39.jpg	This image depicts a nude pubescent minor female, between the age of 12 and 13 years, standing in a bathroom. The female's face is blacked out and her arms are raised above her head. The focus of the image is on the nude minor female.

14. Notably, some of the other still images of MV1 in the Dropbox account (unrelated to the bathroom video and images) contain metadata that indicate that they were created with an iPhone, which is consistent with knowuser321123's statement that he used a phone to create the surreptitious image of MV1 that he sent to SA Alley, which does not have similar metadata associated with it.

15. Based on further interviews with MV1's mother, I have learned that the shirt seen in the surreptitious video recording as MV1 disrobes in the bathroom was purchased in August 2019, when the minor was approximately 12 years old. I am also aware that ADAMS had to connect a device to the Internet in order to transport or transmit the image file Photo Oct 25, 17 25 39.jpg to Dropbox and to send the image via Kik to SA Alley.

Further, the Internet is a means and facility of interstate and foreign commerce, and the image was transported across state lines when SA Alley received the depiction of MV1.

### **CONCLUSION**

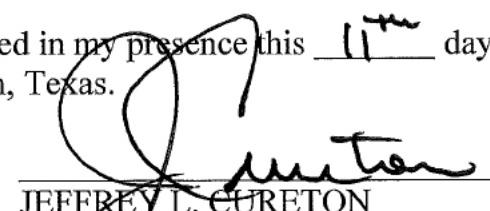
16. In conclusion, there is probable cause to believe that Kik user knowuser321123 created a visual depiction of MV1, that is Photo Oct 25, 17 25 39.jpg. This is based on knowuser321123's statements in his chats with SA Alley and corroborated by evidence located in a Dropbox account that was identified from ADAMS's phone, IP addresses that are consistent with ADAMS's employment, [REDACTED]

[REDACTED] Therefore, based on the facts set forth in this

affidavit, I respectfully submit there is probable to believe that between August 1, 2019 and on or about October 26, 2020, Stephen Russell ADAMS did use and attempt to use a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which was actually transported or transmitted in interstate commerce; that is, the defendant used Minor Victim One to create a visual depiction of the minor engaged in sexually explicit conduct and transported the image via the Internet, in violation of 18 U.S.C. § 2251(a) and (e).

  
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Noel R. Jones, Special Agent  
Homeland Security Investigations

Sworn to before me and subscribed in my presence this 11<sup>th</sup> day of March 2021, at 10:19 A.M./p.m. in Fort Worth, Texas.

  
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JEFFREY L. CURETON  
UNITED STATES MAGISTRATE JUDGE